From: Stefanon, Dyon
To: mdove@fec.gov
Subject: Draft Advisory Opinion 2007-31
Date: 12/10/2007 05:05 PM

Dear Federal Election Commission members,

I am a politically active citizen who has made at least one small ($50 or less) contribution to a political candidate via ActBlue. Based on my own experience, I would strongly urge the Commission to interpret the relevant statues to allow federal matching funds for contributions made via ActBlue. I believe such an interpretation would honor the spirit that animates our campaign finance laws.

Some factors that support that interpretation (based on my understanding about how ActBlue operates):

1) Contributions made via ActBlue are at every point destined for a specific candidate/campaign, *determined by the donor*. At no point, to the best of my understanding, does ActBlue make a decision as to who will receive donated money; as such, the FEC could justifiably determine that ActBlue is the *provider of a financial service,* rather than a *"political committee."*

2) ActBlue should not be understood as "attempting to influence the nomination of any person for elective office," because *the intention to influence a nomination belongs to the contributor, not to ActBlue.* This interpretation is supported by the fact that ActBlue serves simultaneously as a clearinghouse for funds directed to opposing candidates for the same office; ActBlue does not "take sides" in primary elections.

3) By lowering barriers to political contribution, ActBlue acts as a powerful agent for the democratization of American politics. ActBlue makes it much easier for many more people to participate in campaign finance; such widespread participation is one of the goals of our existing campaign finance law--if not explicitly, then implicitly, in the existence of annual campaign contribution limits. Before ActBlue, I had never made a contribution to a specific candidate; I'm sure I'm not the only citizen whose political participation has been eased (and therefore increased) in such a manner by the existence of ActBlue and other services like it.

4) ActBlue and similar services help to level the political playing field between incumbents and challengers by providing challengers with a widely recognized forum for receiving small donations; denying those candidates the benefit of federal matching funds would unnecessarily reinforce the advantages of incumbent candidates.

5) The fact that contributions must be verified by cross-checking bank account numbers with home addresses should provide ample means to prevent ActBlue from serving as a means to circumvent contribution limits.

6) ActBlue transactions are private, like other online financial transactions, so there seems to be little risk that ActBlue could serve as a means to coerce individuals into supporting a particular candidate.

To the extent that they democratize campaign funding, ActBlue and services like are part of a significant opportunity that faces our nation in this historical moment: to increase civic engagement and public participation in the electoral process. I hope the FEC will stand on the side of the common people, rather than promoting the interests of the political establishment, at this moment of historical opportunity.

-Dyon Stefanon
13145 Dairymaid Dr., Apt. T2
Germantown, MD 20874
dyon.stefanon@montgomerycollege.edu